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Filing date: **08/28/2006**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91171881
Party	Defendant ESPN, Inc. ESPN, Inc. ESPN Plaza Bristol, CT 06010
Correspondence Address	Alan Blum Quinn Emanuel Urquhart Oliver & Hedges, 51 Madison Avenue New York, NY 10010
Submission	Answer
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Date	08/28/2006
Attachments	z.hollaback.pdf (3 pages)(30895 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Registration No. 78,675,061
Published for Opposition April 4, 2006
Mark: HOLLA BACK

ALLEN HINES, d/b/a HOLLA BACK
RADIO/HOLLA BACK EDUTAINMENT,

Opposer,

-against-

ESPN INC.,

Applicant.

Opposition No. 91,171,881

**ANSWER TO NOTICE OF
OPPOSITION**

TO THE COMMISSIONER FOR TRADEMARKS:

Applicant ESPN Inc. ("ESPN"), through its attorneys, as its answer to the Notice of Opposition of Allen Hines, d/b/a Holla Back Radio/Holla Back Edutainment, in the above-mentioned matter, alleges as follows:

1. Lacks information sufficient to admit or deny the allegations contained in paragraph 1.
2. Admits the allegations contained in paragraph 2.
3. Admits the allegations contained in paragraph 3.
4. Lacks ability to respond to the allegations in paragraph 4 because the meaning of that paragraph is unclear, ambiguous and vague.
5. Lacks information sufficient to admit or deny the allegations contained in paragraph 5-9.

6. Applicant avers that the WHEREFORE paragraph of the Notice of Opposition does not contain any allegations that require a response. To the extent that the WHEREFORE paragraph is deemed to include allegations, Applicant denies them.

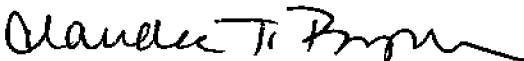
FIRST AFFIRMATIVE DEFENSE

Opposer fails to allege facts sufficient to state a claim upon which relief may be granted.

WHEREFORE, Applicant ESPN, Inc. respectfully requests that this Board issue an order dismissing the Notice of Opposition.

Respectfully submitted,

Dated: August 28, 2006

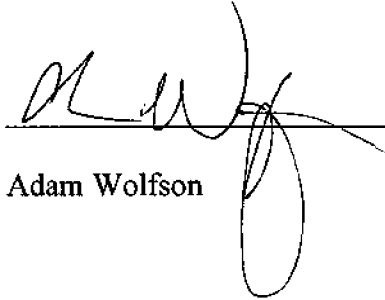
By: 

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Attorneys for Applicant ESPN Inc.

CERTIFICATE OF SERVICE

I certify that on the 28th day of August 2006 true copies of APPLICANT'S ANSWER TO NOTICE OF OPPOSITION was served on Opposer, by sending the same by U.S. mail postage prepaid to Allen Hines d/b/a Holla Back Radio/Holla Back Edutainment, 130 Park Street, Apt. H, Roxboro, NC 27573.


Adam Wolfson